

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
Robertson, Anschutz, Schneid, Crane & Partners, PLLC 130 Clinton Road, Suite 202, Lobby B Fairfield, NJ 07004 Telephone Number 973-575-0707 Attorneys For Secured Creditor Aleisha C. Jennings, Esq. (049302015)	CASE NO.: 24-11377-CMG CHAPTER 13 Objection to Confirmation of Debtor's Chapter 13 Plan
In Re: Brice Edwards, dba Edwards & Son Law Service, Debtor.	

OBJECTION TO CONFIRMATION OF DEBTOR'S CHAPTER 13 PLAN

USAA Federal Savings Bank ("Secured Creditor"), by and through its undersigned counsel, objects to confirmation of Debtor's Chapter 13 Plan (DE #10), and states as follows:

1. Debtor, Brice Edwards, filed a voluntary petition pursuant to Chapter 13 of the Bankruptcy Code on February 14, 2024.
2. Secured Creditor holds a security interest in the Debtor's personal property described as a 2018 Ford F250SD (VIN # 1FT7W2B66JEB24806), by virtue of a Note, Disclosure and Security Agreement – Nonnegotiable Promissory Note dated November 23, 2018. Said Contract secures a Note in the amount of \$50,000.00.
3. Secured Creditor has filed a Proof of Claim in this case on March 14, 2024, Claim No. 5-1.
4. The filed Proof of Claim shows the total amount owed of \$7,956.88 and arrears of \$22.96. Secured Creditor's J.D. Power Used Car valuation shows a Clean Retail Value of \$34,950.00.
5. The Debtor filed an Initial Chapter 13 Plan on February 26, 2024.
6. The Debtor's Chapter 13 Plan does not provide any treatment of Secured Creditor's claim.

7. The Debtor's Chapter 13 Plan does not comply with the provisions of 11 U.S.C. §1325(a)(1) in that it does not provide adequate protection for Secured Creditor's interest pursuant to 11 U.S.C. §361.
8. Secured Creditor reserves the right to present other and further grounds for objection at the hearing on confirmation of Debtor's Chapter 13 Plan.
9. Deny confirmation of the Debtor's Plan, unless it is amended to provide treatment of Secured Creditor's claim in an amount not less than \$5,518.30.
10. The Plan does not appear feasible due to the failure to provide treatment of Secured Creditor's claim. Thus, the plan violates the provisions of 11 U.S.C. § 1325(a)(3) and cannot be confirmed.

WHEREFORE, Secured Creditor respectfully requests this Court sustain the objections stated herein and deny confirmation of Debtor's Plan, and for such other and further relief as the Court may deem just and proper.

Date: 4/1/2024

/s/ Aleisha C. Jennings
Aleisha C. Jennings, Esq. (049302015)
Attorney for Creditor
Robertson, Anschutz, Schneid, Crane & Partners,
PLLC
130 Clinton Road, Suite 202
Fairfield, NJ 07004
Telephone No.: 973-575-0707 (local)
Telephone No.: 561-241-6901 (main)
Email: ajennings@raslg.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on 4/1/2024, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system, and a true and correct copy has been served via CM/ECF or United States Mail to the following parties:

Brice Edwards
540 Smithville Road
Southampton, NJ 08088

Steven J. Abelson
Abelson Law Offices
80 West Main Street
PO Box 7005
Freehold, NJ 07728

Albert Russo
Standing Chapter 13 Trustee
CN 4853
Trenton, NJ 08650-4853

U.S. Trustee
US Dept of Justice
Office of the US Trustee
One Newark Center Ste 2100
Newark, NJ 07102

/s/ Aleisha C. Jennings
Aleisha C. Jennings, Esq. (049302015)
Attorney for Creditor
Robertson, Anschutz, Schneid, Crane & Partners,
PLLC
130 Clinton Road, Suite 202
Fairfield, NJ 07004
Telephone No.: 973-575-0707 (local)
Telephone No.: 561-241-6901 (main)
Email: ajennings@raslg.com